

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

LAW OFFICES OF ALAN L. ZEGAS

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Attorneys for Defendant,
Sharpe James

UNITED STATES OF AMERICA,

Plaintiff,

v.

Criminal No. 07-578 (WJM)

SHARPE JAMES and TAMIKA RILEY,

Defendants.

NOTICE OF PRETRIAL MOTIONS

TO: Judith H. Germano, AUSA
Perry Primavera, Special AUSA
Phillip H. Kwon, AUSA
United States Attorney's Office
970 Broad Street, Suite 700
Newark, New Jersey 07102

PLEASE TAKE NOTICE that on December 17, 2007, at 9:00 in the forenoon, or as soon thereafter as defendant may be heard, counsel for the defendant Sharpe James, through his attorneys, Thomas R. Ashley, Esq., Raymond A. Brown, Esq., and Alan L.

Zegas, Esq., will move before the Honorable William J. Martini of the United States District Court for the District of New Jersey, Newark, New Jersey, for an Order:

1. Compelling the government to disclose the names of the recipients of grand jury subpoenas and the names of the persons interviewed;
2. Setting a date for a preliminary hearing on other crimes evidence;
3. Dismissing Counts 21 to 25 of the Indictment for failure to state a crime;
4. Suppressing any post-conspiracy statements made by co-defendant Riley, which refer to defendant James;
5. Granting a continuance of the trial date;
6. Excluding all potential jurors who are familiar with this case for cause and permitting counsel for the defense and the government to participate in the voir dire;
7. Directing the Government to supply defendant with a Bill of Particulars;
8. Striking the inflammatory language in the indictment;
9. Compelling all the federal, state and local government's agents to preserve their rough notes, report drafts and final reports;
10. Dismissing the indictment in its entirety;
11. Granting Defendant's Request to review the grand jury transcripts;
12. Directing the Government to disclose the identities and addresses of any informants against defendant and to disclose the location of the undercover surveillance site;
13. Directing the government to supply defendant with a list of witnesses and with an inventory list of all evidence seized from defendant's workplace;
14. Setting a date for a hearing to suppress any post-arrest statements;
15. Granting defendant permission to serve subpoena requests in advance of trial;
16. Suppressing any items seized from defendant;
17. Dismissing the indictment for failure to state an offense;
18. Joining in all such arguments raised by his co-defendant to the extent applicable to him.

PLEASE TAKE FURTHER NOTICE, that the undersigned respectfully requests oral argument.

In support of the foregoing, defendant shall rely upon the annexed brief and oral argument.

LAW OFFICES OF ALAN L. ZEGAS

/s/ Alan L. Zegas
BY: ALAN L. ZEGAS
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Dated: November 5, 2007